

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA	)
	)
V.	)
1. LEO CAMBRIA,	)No. 05-10027-MLW
2. GINA CAPODILUPO,	)
a/k/a "Gina Cambria"	)
3. DEBRA TAMBURINO,	)
	)
Defendants	)

JOINT MOTION TO SCHEDULE A STATUS CONFERENCE  
(AND TO EXCLUDE TIME)

The United States of America and the defendants, Leo Cambria ("Cambria"), Gina Capodilupo ("Capodilupo") and Debra Tamburino ("Tamburino") hereby respectfully request that this Court schedule a status conference, at the Court's convenience, and exclude time from June 30, 2005 to the date of such status conference.

In support of this motion, the parties state as follows:

1. This case has been reported up to the District Court, as discovery is complete.

2. The parties continue to discuss the possibility of a resolution short of trial. In addition, at the final status conference before Judge Swartwood, counsel for Debra Tamburino indicated an interest in pursuing a medical evaluation before determining what course to take with respect to motions and trial.

3. The defendants are assessing possible grounds for

motions to suppress or dismiss.

Accordingly, the parties respectfully request that this Court schedule a status conference, at the Court's convenience, and that the Court order excluded under the Speedy Trial Act all time from June 30, 2005 (the final excluded date pursuant to the Final Status Conference Report) to the date set by the Court for a status conference.

Respectfully submitted,

GINA CAPODILUPO

MICHAEL J. SULLIVAN  
United States Attorney

By: /s/ Alfred P. Farese  
ALFRED P. FARESE, JR.

By: /s/ Rachel E. Hershfang  
RACHEL E. HERSHFANG  
Assistant U.S. Attorney

DEBRA TAMBURINO

LEO CAMBRIA

By: /s/ Elliott Weinstein  
ELLIOTT WEINSTEIN, ESQ.

By: /s/ J. W. Carney  
J. W. CARNEY, ESQ.

Dated: August 3, 2005